

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

In re:  
MARILYN B. CAVANAUGH

Debtor(s).

Under Chapter 13  
Case No. 20-10485 JA

**CHAPTER 13 TRUSTEE'S OBJECTION  
TO CONFIRMATION OF DEBTOR'S FIRST AMENDED CHAPTER 13 PLAN**

COMES NOW, Tiffany M. Cornejo, Chapter 13 Standing Trustee and objects to the confirmation of Debtor's First Amended Chapter 13 Plan. In support of thereof, Trustee states as follows:

1. **Completion**: Debtor's plan payments are insufficient to pay all allowed claims as set forth in the Chapter 13 Plan. Debtor must provide a plan payment sufficient to pay all claims as proposed by the Plan.
2. **Leave to Amend**: The chapter 13 trustee reserves the right to interpose additional objections upon the filing of any amendments to the debtor's plan, schedules and statement of affairs upon the debtor's providing the documentation requested above and upon the debtor's providing documentation verifying income and expenses and proof of insurance.

WHEREFORE, the Chapter 13 Trustee respectfully requests that the Court deny confirmation of the Debtors' plan and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/Tiffany M. Cornejo  
TIFFANY M. CORNEJO, Trustee  
Chapter 13 Standing Trustee  
625 Silver SW, Ste. 350  
Albuquerque, NM 87102  
Telephone: (505) 243-1335  
Facsimile: (505) 247-2709  
Email: [orders@ch13nm.com](mailto:orders@ch13nm.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was mailed to the following interested parties who have not been electronically notified this 5<sup>th</sup> day of March 2021 with the correct postage prepaid and deposited in the U.S. Mail.

Marilyn Cavanaugh  
21 Castle Rock Rd. SE  
Rio Rancho, NM 87124

/s/JoAnne Encinias